

DETERMINATION TO PREPARE AN ENVIRONMENTALASSESSMENT

Name of Project: Herbicide Application at Three Substations

Location: Imperial County, California and Maricopa and Yuma Counties, Arizona

Description of the Proposed Action: The purpose of the proposed action is to authorize Western Area Power Administration (Western) to use selected herbicides for the treatment of undesirable vegetation within three existing substations on lands administered by the Bureau of Land Management (BLM). The need for the proposed action is to reduce the potential for safety hazards to workers, damage to equipment, and outages.

Western's desired goal is to maintain a bare ground standard in all substations. Vegetation within substations is incompatible because of (1) the risk of electrical outages and fire ignition caused by vegetation interference with electrical equipment, (2) risk of wildfire spreading through the substation, and (3) the safety risk to workers within the substation from "energized" vegetation.

Utilities must manage undesirable vegetation and reduce hazardous fuels to ensure a safe and reliable supply of electricity and to maintain the utility rights-of-way and infrastructure in safe and reliable operating conditions pursuant to industry standards, regulations, and recommendations. To successfully meet these requirements, Western must implement vegetation management. Adding herbicide application to existing practices reduces the frequency, duration, and cost of vegetation management when compared to manual and mechanical methods alone. Herbicide treatment in combination with current manual and mechanical vegetation management methods can be an effective, economical, and an environmentally sound method to maintain vegetation within the utility rights-of- way.

Table 1. Legal Description for Western Substations Proposed for Herbicide Treatment

Substation	County/ State	BLM Field Office	Public Land Survey System
Senator Wash	Imperial/CA	Yuma	Township 15 South, Range 24 East, Range 5 ¹
Sonora	Yuma/AZ	Yuma	Township 11 South, Range 23 West, Section 14 ²
Spook Hill	Maricopa/ AZ	Phoenix	Township 1 North, Range 7 East, Section 18 ²

¹San Bernardino Baseline and Meridian
²Gila and Salt River Baseline and Meridian

Western has been using mechanical and manual methods to control vegetation at existing substations. These methods of vegetation control at the substations have not been successful and vegetation has become an issue at numerous Western substations. Gravel is used at the electrical substations to maintain an insulating buffer for workers. The gravel insulates the workers from potentials that may be present in the soil during electrical faults and also provides a more stable working surface during wet periods than either soil or grass. Vegetation control at the stations is necessary to eliminate vegetation from the gravel areas that may result in electric potentials which may be hazardous to workers and to reduce the risk of fire from dried vegetation. Vegetation control at all of the stations also provides ease of travel within the station during maintenance and emergency response, and prevents vegetative interference with operational equipment.

Western proposes to use, and the BLM must determine whether to authorize the use of, selected herbicides at three existing substations. Therefore, Western and the BLM will act as co-lead agencies during the National Environmental Policy Act (NEPA) process.

Class of Action from Department of Energy (DOE) NEPA Regulations: The items listed in Appendix B are classes of actions that do not individually or cumulatively have a significant effect on the human environment (categorical exclusions (CXs)). Appendix B1.3 states "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and *localized vegetation and pest control*, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements" (emphasis added). The proposed action falls under Appendix B1.3 because it entails localized herbicide application and other vegetation control methods within existing disturbed substation facilities. However, because the BLM action requires an Environmental Assessment (EA) per 516 DM 11.7, Western will prepare an EA rather than a CX to meet that requirement.

Determination: Based on Section 1021.300 of the DOE NEPA Implementing Procedures, and applicable BLM NEPA requirements, I have determined that an EA will be prepared to assess the impacts of the proposed action. Based on the EA analysis, Western will either prepare a finding of no significant impact and proceed with the action, or Western will prepare an Environmental Impact Statement if the EA reveals the potential for significant environmental impacts.



Ronald Moulton
Senior Vice President and
Desert Southwest Regional Manager



Date